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Telephone: (424) 788-4538

Attorneys for Judgment Creditors and Plaintiffs
Erica and Joseph Vago

UNITED STATES BANKRUPTCY COURT
CENTRAL DISTRICT OF CALIFORNIA
LOS ANGELES DIVISION

In re
LESLIE KLEIN,
Debtor.

ERICA VAGO and JOSEPH VAGO,
Plaintiffs,
vs.
LESLIE KLEIN and DOES 1 through 10,
Defendants.

Case No. 2:23-bk-10990-SK

Chapter 11

Adv. Case No. 2:23-ap-01150-SK

**STATEMENT OF PLAINTIFFS RE
PLAINTIFFS' EFFORTS TO COMPLY
WITH SCHEDULING ORDER AFTER
STATUS CONFERENCE;
DECLARATION OF REEM J. BELLO IN
SUPPORT THEREOF**

Status Conference Date:

Date: April 17, 2024

Time: 9:00 a.m.

Crtm: 1575

Erica Vago and Joseph Vago (“Plaintiffs”) hereby submit this Statement (“Statement”) Regarding the Scheduling Order After Status Conference (“Scheduling Order”) to advise the Court of Plaintiffs’ efforts to comply with the Scheduling Order prior to the scheduled April 17, 2024 status conference (“Status Conference”) in the above-entitled adversary proceeding (“Vago Proceeding”) in the bankruptcy case of Leslie Klein (“Debtor”), and respectfully represent as follows:

I. STATEMENT OF FACTS CONCERNING PLAINTIFFS’ EFFORTS TO COMPLY WITH SCHEDULING ORDER

A. The Scheduling Order Setting Deadlines re Mediation

On December 20, 2023, a status conference was held in the Vago Proceeding in which the Court ordered the Plaintiffs and Leslie Klein (“Defendant”) to mediation. An order was entered on December 20, 2023 [Docket No. 40] in which the Court set the following deadlines:

1. Erica and Joseph Vago (“Plaintiffs”) and Leslie Klein (“Defendant”) (collectively, the “Parties”) shall meet and confer on the choice of mediator by February 3, 2024;
2. Counsel for Plaintiffs shall contact the mediator by February 10, 2024 to schedule the mediation;
3. The Parties shall complete one session of mediation by March 10, 2024;
4. A continued Status Conference shall be held on April 17, 2024 at 9:00 a.m.; and
5. A joint status report shall be filed by April 3, 2024.

See Scheduling Order attached as **Exhibit 1** to the attached Declaration of Reem J. Bello (“Bello Declaration”).

B. Plaintiffs’ Efforts to Comply with Scheduling Order

On December 20, 2023, Plaintiffs’ counsel sent correspondence to Defendant requesting that Defendant advise of his choice of mediator. See **Exhibit 2** to Bello Declaration. Defendant responded, with “Ok Thank yo [sp]”. See **Exhibit 2**.

1 During the month of January 2024, Plaintiffs' counsel and Defendant had several
2 exchanges of correspondence regarding the choice of mediator, and eventually Judge Meredith
3 Jury ("Mediator") was chosen as a mediator on or about January 31, 2024. *See* Bello Declaration
4 and **Exhibit 3**. Plaintiffs' counsel timely complied with the Scheduling Order by contacting the
5 Mediator in advance of the deadline set by the Court. On January 31, 2024, Marc Lieberman
6 ("Mr. Lieberman") sent correspondence on behalf of Defendant to the Mediator. *See* **Exhibit 4**.
7 On January 31, 2024, the Mediator sent correspondence to the parties advising of her available
8 dates to mediate the Vago Proceeding. *See* **Exhibit 5**.

9 On February 2, 2024, Plaintiffs' counsel sent correspondence to the Mediator, and cc'd
10 Marc Lieberman and Defendant, advising of dates that Plaintiffs are available for mediation. *See*
11 **Exhibit 6**.

12 After not receiving a response from Defendant regarding available dates for mediation,
13 Plaintiffs' counsel sent follow-correspondence to the Mediator. *See* **Exhibit 7**. The Mediator sent
14 correspondence advising that she had not heard from the Defendant regarding available dates. *Id.*
15 *See* **Exhibit 7**. Defendant then sent correspondence to Plaintiffs' counsel advising that he "agreed
16 to" March 29 which is outside the deadline set by the Court in the Scheduling Order. *See* **Exhibit**
17 **8**. Mr. Lieberman then sent correspondence to Plaintiffs' counsel advising that he would "get a
18 response from Les today. Remind me again the date(s) you want". *See* **Exhibit 9**. Plaintiffs'
19 counsel sent correspondence to Mr. Lieberman advising him of the dates that the Plaintiffs are
20 available within the time frame set by the Court in the Scheduling Order. *Id.* After not receiving
21 correspondence from Defendant or Mr. Lieberman of Defendant's available dates for mediation
22 through March 10, 2024, Plaintiffs' counsel sent follow-up correspondence to Defendant. *See*
23 **Exhibit 10**. The Mediator responded that she was still available to mediate on March 6 (one of
24 the dates that the Plaintiffs had chosen for mediation). *Id.* Defendant then sent multiple
25 correspondences to Plaintiffs' counsel insisting upon having the mediation conducted on March
26 29, 2024. *See* **Exhibit 11**. Plaintiffs' counsel sent multiple correspondences to Defendant in
27
28

1 response advising that March 29, 2024 was not within the time frame set by the Court in the
2 Scheduling Order and moreover, Plaintiffs' counsel was not available on that date. *Id.* Debtor
3 sent email correspondence asserting that he is not available to mediate before the March 10, 2024
4 deadline, but he is available to mediate "March 27 to April 10". *Id.*

5 Plaintiffs attempted to comply with the Court's Scheduling Order but have been unable to
6 do so as set forth in **Exhibits 2 through 11** attached to the Bello Declaration. Plaintiffs' counsel
7 spoke with the Mediator on March 1, 2024 and has been advised that of the dates set forth in
8 Defendant's correspondence included in **Exhibit 11**, the Mediator is available on April 8, 9 or 10.
9 See ¶ 4 of Bello Declaration. Plaintiffs and Plaintiffs' counsel are currently available for
10 mediation on April 9 or 10.

11 **II. CONCLUSION**

12 Plaintiffs submit this Statement in order to advise the Court of the status of the Plaintiffs'
13 efforts to schedule mediation in the Vago Adversary.

14 Respectfully submitted,

15 Dated: March 1, 2024

GOE FORSYTHE & HODGES LLP

17 By: /s/Robert P. Goe
18 Robert P. Goe
19 Attorneys for Plaintiffs Erica Vago and
20 Joseph Vago
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DECLARATION OF REEM J. BELLO

1
2 1. I am an attorney with the law firm of Goe Forsythe & Hodges LLP, co-counsel for
3 Erica Vago and Joseph Vago ("Plaintiffs") in the above-entitled adversary proceeding ("Vago
4 Proceeding") in the bankruptcy case of Leslie Klein ("Debtor"). I have personal knowledge of the
5 facts set forth herein except where otherwise stated. I make this declaration in support of the
6 Statement ("Statement") Regarding the Scheduling Order After Status Conference ("Scheduling
7 Order") to which this declaration is attached. Any terms not otherwise defined herein have the
8 same meanings as they do in the Statement.

9 2. Attached as **Exhibit 1** is the scheduling order entered by the Court on December
10 20, 2023 [Docket No. 40].

11 3. Attached as **Exhibits 2 through 11** are email correspondences between my firm
12 and Defendant, Mr. Lieberman and the Mediator.

13 4. I spoke with the Mediator on March 1, 2024 and the Mediator advised me that with
14 respect to the Defendant's timeframe of availability to mediate "March 27 to April 10", the
15 Mediator is available to conduct mediation on April 8, 9 or 10.

16 I declare, under the laws of the United States of America, that the foregoing is true and
17 correct to the best of my knowledge. Executed this 1st day of March 2024, at Orange County,
18 California.

19 

20 Reem J. Bello
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EXHIBIT 1

EXHIBIT 1

ROBERT P. GOE (State Bar No. 137019
rgoe@goeforlaw.com
REEM J. BELLO (State Bar No. 198840)
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Defendants.

Case No. 2:23-bk-10990-SK

Chapter 11

Adv. Case No. 2:23-ap-01150-SK

**SCHEDULING ORDER AFTER STATUS
CONFERENCE**

Status Conference Date:

Date: December 20, 2023

Time: 9:00 a.m.

Crtn: 1575 (via ZoomGov)

FILED & ENTERED

DEC 20 2023

CLERK U.S. BANKRUPTCY COURT
Central District of California
BY may DEPUTY CLERK

1 The Status Conference (“Status Conference”) in the above-entitled adversary proceeding in
2 the bankruptcy case of Leslie Klein (“Debtor”), took place on the date and time indicated above
3 and the Court ordered as follows:

4 **IT IS ORDERED:**

- 5 1. Erica Vago and Joseph Vago (“Plaintiffs”) and Leslie Klein (“Defendant”)
6 (collectively, the “Parties”) shall meet and confer on the choice of mediator by February 3, 2024;
7 2. Counsel for Plaintiffs shall contact the mediator by February 10, 2024 to schedule
8 the mediation;
9 3. The Parties shall complete one session of mediation by March 10, 2024;
10 4. A continued Status Conference shall be held on April 17, 2024 at 9:00 a.m.; and
11 5. A joint status report shall be filed by April 3, 2024.

12 ###

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22
23 Date: December 20, 2023



Sandra R. Klein
United States Bankruptcy Judge

EXHIBIT 2

EXHIBIT 2

From: [Leslie Klein](#)
To: [Reem Bello](#)
Subject: Re: Vago v. Klein Meet and Confer re Choice of Mediator
Date: Wednesday, December 20, 2023 9:31:38 AM
Attachments: [image001.png](#)



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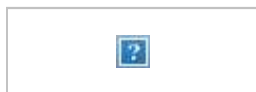
Ok Thank yo

Sent from my iPhone

On Dec 20, 2023, at 9:28 AM, Reem Bello <rbello@goeforlaw.com> wrote:

Mr. Klein,

Pursuant to the Court's order at the status conference held today, please advise of your choice of mediators for the Vago v. Klein adversary proceeding. We will discuss the same with our clients and send you our proposal for mediators as well. Thank you.



Reem J. Bello | Partner

Goe Forsythe & Hodges LLP

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STATE OR LOCAL TAX LAW PROVISIONS.

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EXHIBIT 3

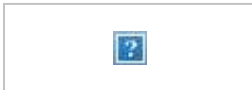
EXHIBIT 3

From: [Reem Bello](#)
To: ["Meredith Jury"](#)
Cc: [Susan Stein](#); [Rob Goe](#); [Leslie Klein](#); [Marc Lieberman](#); [Steven Mayer](#)
Subject: Mediation in the Case of Leslie Klein
Date: Wednesday, January 31, 2024 11:57:00 AM
Attachments: [image001.png](#)

Good morning Judge Jury,

I represent Erica and Joseph Vago ("Vagos") in the bankruptcy case of debtor Leslie Klein ("Debtor"). Debtor is cc'd on this email as well as proposed counsel for Debtor in this nondischargeability adversary proceeding the Vagos filed against the Debtor. Judge Sandra Klein ordered the parties to mediation. The parties have met and conferred as required by the Court on choice of mediator and have agreed to contact you regarding your availability to mediate this matter. Pursuant to the scheduling order attached, the parties must complete one day of mediation by March 10. Are you available and interested in mediating this matter? If so, please let us know what dates and times work for you between now and March 10.

Also, there is another nondischargeability adversary proceeding involving a separate, unrelated plaintiff who may also be interested in having you mediate their adversary proceeding. I have cc'd counsel for that plaintiff on this email as well. Thank you.



Reem J. Bello | Partner

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rbello@goeforlaw.com | www.goeforlaw.com

EXHIBIT 4

EXHIBIT 4

From: [Marc Lieberman](#)
To: "Meredith Jury"
Cc: [Susan Stein](#); [Rob Goe](#); [Leslie Klein](#); "Steven Mayer"; [Reem Bello](#)
Subject: RE: Mediation in the Case of Leslie Klein
Date: Wednesday, January 31, 2024 12:31:46 PM
Attachments: [image007.png](#)
[image002.png](#)
[image003.png](#)
[image012.png](#)
[image013.png](#)



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Judge Jury:

I represent Les Klein's law firm and am in the process of being retained to represent him at mediation. The issue is complicated by the fact that he is presently a Chapter 11 debtor, but not a debtor-in-possession. A motion to convert to Chapter 7 is set for February 28, 2024. In anticipation of the case converting and me being retained, I would ask that the mediations be set for the month of March.

MARC A. LIEBERMAN, ESQ.

FLP LAW GROUP, LLP

(formerly [Fredman Lieberman Pearl LLP](#))

1875 Century Park East, Suite 2230

Los Angeles, CA 90067

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From: Steven Mayer [mailto:smayer@mayerlawla.com]
Sent: Wednesday, January 31, 2024 12:26 PM
To: Reem Bello; 'Meredith Jury'
Cc: Susan Stein; Rob Goe; Leslie Klein; Marc Lieberman
Subject: RE: Mediation in the Case of Leslie Klein

Ms. Bello, thank you for including me on your below email.

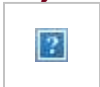
Judge Jury, I represent the Plaintiff in the other adversary matter mentioned in Ms. Bello's email, which Judge Klein also ordered to mediation and with the same deadlines. I have been speaking with Ms. Bello and Mr. Lieberman in this regard, and I am also interested in having you mediate my case. They do not object to this request.

My client is Jeffrey Siegel, Successor Trustee of the Scott Trust Agreement dated December 24, 1992. Judge Klein entered a Scheduling Order with the same deadlines as Ms. Bello's case. Attached are copies of the Complaint and Scheduling Order.

Thank you.

-Steve

Steven M. Mayer, Esq.
Mayer Law Group, A.P.C.



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F (818) 514-2728

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From: Reem Bello <rbello@goeforlaw.com>
Sent: Wednesday, January 31, 2024 11:58 AM
To: 'Meredith Jury' <majury470@gmail.com>
Cc: Susan Stein <sstein@goeforlaw.com>; Rob Goe <rgoe@goeforlaw.com>; Leslie Klein <les.kleinlaw@gmail.com>; Marc Lieberman <marc.lieberman@flpllp.com>; Steven Mayer

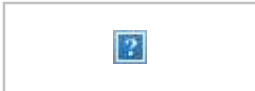
<smayer@mayerlawla.com>

Subject: Mediation in the Case of Leslie Klein

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Reem J. Bello | Partner

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EXHIBIT 5

EXHIBIT 5

From: [Meredith Jury](#)
To: [Steven Mayer](#)
Cc: [Reem Bello](#); [Susan Stein](#); [Rob Goe](#); [Leslie Klein](#); [Marc Lieberman](#)
Subject: Re: Mediation in the Case of Leslie Klein
Date: Wednesday, January 31, 2024 12:51:56 PM
Attachments: [image002.png](#)
[image003.png](#)



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If I understand these two emails correctly, there are two adversaries against the debtor and therefore a need for two mediations. I believe that both need the mediation at least started by March 10. Mr. Lieberman's email implies some things may change that deadline but right now I am working with the ordered date. I am willing to do both and am sending out the dates in this one email for all of you to figure out what date might work for each mediation. My dates between now and March 10 are February 12, 19, 21, 23, 26 and March 1, 4, 6, 8. It would help if I got a separate email selecting a date for each mediation so that I can be certain which attorneys and parties are involved with that particular mediation. Thanks.
P.S. later dates in March are 11, 20, 25, 27, and 29 if the deadline changes.

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Judge Jury, I represent the Plaintiff in the other adversary matter mentioned in Ms. Bello's email, which Judge Klein also ordered to mediation and with the same deadlines. I have been speaking with Ms. Bello and Mr. Lieberman in this regard, and I am also interested in having you mediate my case. They do not object to this request.

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Sent: Wednesday, January 31, 2024 11:58 AM

To: 'Meredith Jury' <majury470@gmail.com>

Cc: Susan Stein <sstein@goeforlaw.com>; Rob Goe <rgoe@goeforlaw.com>; Leslie Klein <les.kleinlaw@gmail.com>; Marc Lieberman <marc.lieberman@flpllp.com>; Steven Mayer <smayer@mayerlawla.com>

Subject: Mediation in the Case of Leslie Klein

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Reem J. Bello | Partner

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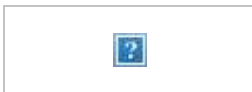
EXHIBIT 6

EXHIBIT 6

From: [Reem Bello](#)
To: [Meredith Jury](#)
Cc: [Susan Stein](#); [Rob Goe](#); [Leslie Klein](#); [Marc Lieberman](#)
Subject: RE: Mediation in the Case of Leslie Klein
Date: Friday, February 2, 2024 11:52:00 AM
Attachments: [~WRD0005.jpg](#)
[image001.png](#)
[image002.png](#)

Judge Jury,

Good afternoon. The Vagos are available on February 21 and March 6 for a Zoom mediation session. Thank you.



Reem J. Bello | Partner

Goe Forsythe & Hodges LLP

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rbello@goeforlaw.com | www.goeforlaw.com

From: Meredith Jury <majury470@gmail.com>

Sent: Wednesday, January 31, 2024 12:51 PM

To: Steven Mayer <smayer@mayerlawla.com>

Cc: Reem Bello <rbello@goeforlaw.com>; Susan Stein <sstein@goeforlaw.com>; Rob Goe <rgoe@goeforlaw.com>; Leslie Klein <les.kleinlaw@gmail.com>; Marc Lieberman <marc.lieberman@flpllp.com>

Subject: Re: Mediation in the Case of Leslie Klein



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On Wed, Jan 31, 2024 at 12:26 PM Steven Mayer <smayer@mayerlawla.com> wrote:

Ms. Bello, thank you for including me on your below email.

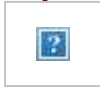
Judge Jury, I represent the Plaintiff in the other adversary matter mentioned in Ms. Bello's email, which Judge Klein also ordered to mediation and with the same deadlines. I have been speaking with Ms. Bello and Mr. Lieberman in this regard, and I am also interested in having you mediate my case. They do not object to this request.

My client is Jeffrey Siegel, Successor Trustee of the Scott Trust Agreement dated December 24, 1992. Judge Klein entered a Scheduling Order with the same deadlines as Ms. Bello's case. Attached are copies of the Complaint and Scheduling Order.

Thank you.

-Steve

Steven M. Mayer, Esq.
Mayer Law Group, A.P.C.



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Encino, CA 91436

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From: Reem Bello <rbello@goeforlaw.com>

Sent: Wednesday, January 31, 2024 11:58 AM

To: 'Meredith Jury' <majury470@gmail.com>

Cc: Susan Stein <sstein@goeforlaw.com>; Rob Goe <rgoe@goeforlaw.com>; Leslie Klein <les.kleinlaw@gmail.com>; Marc Lieberman <marc.lieberman@flpllp.com>; Steven Mayer <smayer@mayerlawla.com>

Subject: Mediation in the Case of Leslie Klein

Good morning Judge Jury,

I represent Erica and Joseph Vago ("Vagos") in the bankruptcy case of debtor Leslie Klein ("Debtor"). Debtor is cc'd on this email as well as proposed counsel for Debtor

in this nondischargeability adversary proceeding the Vagos filed against the Debtor. Judge Sandra Klein ordered the parties to mediation. The parties have met and conferred as required by the Court on choice of mediator and have agreed to contact you regarding your availability to mediate this matter. Pursuant to the scheduling order attached, the parties must complete one day of mediation by March 10. Are you available and interested in mediating this matter? If so, please let us know what dates and times work for you between now and March 10.

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Reem J. Bello | Partner

Goe Forsythe & Hodges LLP

17701 Cowan Avenue, Suite 210 (Lobby D) | Irvine, CA 92614

Office (949) 798-2460 | Fax (949) 955-9437

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EXHIBIT 7

EXHIBIT 7

From: [Meredith Jury](#)
To: [Reem Bello](#)
Cc: [Susan Stein](#); [Rob Goe](#); [Leslie Klein](#); [Marc Lieberman](#)
Subject: Re: Mediation in the Case of Leslie Klein
Date: Monday, February 12, 2024 9:05:44 AM



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No. I only have your dates for this mediation

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Have we heard from the Debtor regarding dates? Thank you.

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rbello@goeforlaw.com | www.goeforlaw.com

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<image001.png>

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Cc: Reem Bello <rbello@goeforlaw.com>; Susan Stein <sstein@goeforlaw.com>; Rob Goe <rgoe@goeforlaw.com>; Leslie Klein <les.kleinlaw@gmail.com>; Marc Lieberman <marc.lieberman@flpllp.com>
Subject: Re: Mediation in the Case of Leslie Klein

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Steven M. Mayer, Esq.

Mayer Law Group, A.P.C.

<image002.png>

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To: 'Meredith Jury' <majury470@gmail.com>

Cc: Susan Stein <sstein@goeforlaw.com>; Rob Goe <rgoe@goeforlaw.com>;

Leslie Klein <les.kleinlaw@gmail.com>; Marc Lieberman

<marc.lieberman@flpllp.com>; Steven Mayer <smayer@mayerlawla.com>

Subject: Mediation in the Case of Leslie Klein

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counsel for Debtor in this nondischargeability adversary proceeding the Vagos filed against the Debtor. Judge Sandra Klein ordered the parties to mediation. The parties have met and conferred as required by the Court on choice of mediator and have agreed to contact you regarding your availability to mediate this matter. Pursuant to the scheduling order attached, the parties must complete one day of mediation by March 10. Are you available and interested in mediating this matter? If so, please let us know what dates and times work for you between now and March 10.

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<image001.png>

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EXHIBIT 8

EXHIBIT 8

From: [Leslie Klein](#)
To: [Reem Bello](#)
Subject: Re: Mediation in the Case of Leslie Klein
Date: Monday, February 12, 2024 9:05:35 AM
Attachments: [image001.png](#)
[~WRD0005.jpg](#)
[image002.png](#)



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I agreed to March 29. Thanx
Sent from my iPhone

On Feb 12, 2024, at 8:55 AM, Reem Bello <rbello@goeforlaw.com> wrote:

Good morning Judge Jury,

Have we heard from the Debtor regarding dates? Thank you.

Reem J. Bello | Partner
Goe Forsythe & Hodges LLP
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rbello@goeforlaw.com | www.goeforlaw.com

On Feb 2, 2024, at 11:52 AM, Reem Bello <rbello@goeforlaw.com> wrote:

Judge Jury,

Good afternoon. The Vagos are available on February 21 and March 6 for a Zoom mediation session. Thank you.

<[image001.png](#)>

Reem J. Bello | Partner
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rbello@goeforlaw.com | www.goeforlaw.com

From: Meredith Jury <majury470@gmail.com>
Sent: Wednesday, January 31, 2024 12:51 PM
To: Steven Mayer <smayer@mayerlawla.com>
Cc: Reem Bello <rbello@goeforlaw.com>; Susan Stein
<sstein@goeforlaw.com>; Rob Goe <rgoe@goeforlaw.com>; Leslie Klein
<les.kleinlaw@gmail.com>; Marc Lieberman
<marc.lieberman@flpllp.com>
Subject: Re: Mediation in the Case of Leslie Klein

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<image002.png>

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From: Reem Bello <rbello@goeforlaw.com>

Sent: Wednesday, January 31, 2024 11:58 AM

To: 'Meredith Jury' <majury470@gmail.com>

Cc: Susan Stein <sstein@goeforlaw.com>; Rob Goe

<rgoe@goeforlaw.com>; Leslie Klein <les.kleinlaw@gmail.com>;

Marc Lieberman <marc.lieberman@flpllp.com>; Steven Mayer

<smayer@mayerlawla.com>

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EXHIBIT 9

EXHIBIT 9

From: [Reem Bello](#)
To: [Marc Lieberman](#); [Meredith Jury](#)
Cc: [Susan Stein](#); [Rob Goe](#); [Leslie Klein](#)
Subject: RE: Mediation in the Case of Leslie Klein
Date: Monday, February 12, 2024 10:24:00 AM
Attachments: [~WRD0002.jpg](#)
[image001.png](#)

Marc,

The Vagos are available February 21 and March 6 for a Zoom mediation session. Thank you.



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From: Marc Lieberman <marc.lieberman@flpllp.com>
Sent: Monday, February 12, 2024 9:07 AM
To: Meredith Jury <majury470@gmail.com>
Cc: Reem Bello <rbello@goeforlaw.com>; Susan Stein <ssstein@goeforlaw.com>; Rob Goe <rgoe@goeforlaw.com>; Leslie Klein <les.kleinlaw@gmail.com>
Subject: Re: Mediation in the Case of Leslie Klein



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I will get you a response from Les today. Remind me again the date(s) you want.

MARC A. LIEBERMAN, ESQ.
[FLP Law Group LLP](#)
[1875 Century Park East, Suite 2230](#)
[Los Angeles, CA 90067](#)
t. [310.284.7350 ext. 2](#)
marc.lieberman@flpllp.com
www.flpllp.com

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On Feb 12, 2024, at 9:05 AM, Meredith Jury <majury470@gmail.com> wrote:

No. I only have your dates for this mediation

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Reem J. Bello | Partner

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<image001.png>

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EXHIBIT 10

EXHIBIT 10

From: [Meredith Jury](#)
To: [Reem Bello](#)
Cc: [Leslie Klein](#); [Susan Stein](#); [Rob Goe](#)
Subject: Re: Mediation in the Case of Leslie Klein
Date: Thursday, February 29, 2024 3:28:49 PM
Attachments: [image001.png](#)



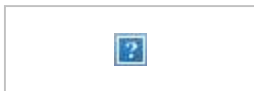
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I can still mediate on March 6 if that date works

On Thu, Feb 29, 2024 at 3:24 PM Reem Bello <rbello@goeforlaw.com> wrote:

Mr. Klein,

We have not heard back from you regarding the Court-ordered mediation and it has been weeks since my last email. Pursuant to the attached order, we are required to complete one mediation session by March 10, 2024. We have sent our available dates a number of times, but we have not received a response from you. Again, the Vagos are available on March 6 for a Zoom mediation, but Judge Jury may no longer be available. Please advise of your availability to mediate through March 10. Thank you.



Reem J. Bello | Partner

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rbello@goeforlaw.com | www.goeforlaw.com

From: Reem Bello

Sent: Monday, February 12, 2024 10:25 AM

To: Marc Lieberman <marc.lieberman@flpllp.com>; Meredith Jury <majury470@gmail.com>

Cc: Susan Stein <sstein@goeforlaw.com>; Rob Goe <rgoe@goeforlaw.com>; Leslie Klein <les.kleinlaw@gmail.com>

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Goe Forsythe & Hodges LLP

17701 Cowan Avenue, Suite 210 (Lobby D) | Irvine, CA 92614

Office (949) 798-2460 | Fax (949) 955-9437

rbello@goeforlaw.com | www.goeforlaw.com

From: Marc Lieberman <marc.lieberman@flpllp.com>

Sent: Monday, February 12, 2024 9:07 AM

To: Meredith Jury <majury470@gmail.com>

Cc: Reem Bello <rbello@goeforlaw.com>; Susan Stein <sstein@goeforlaw.com>; Rob Goe <rgoe@goeforlaw.com>; Leslie Klein <les.kleinlaw@gmail.com>

Subject: Re: Mediation in the Case of Leslie Klein

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I will get you a response from Les today. Remind me again the date(s) you want.

MARC A. LIEBERMAN, ESQ.

[FLP Law Group LLP](#)

1875 Century Park East, Suite 2230

Los Angeles, CA 90067

t. [310.284.7350 ext. 2](tel:310.284.7350)

marc.lieberman@flpllp.com

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On Feb 12, 2024, at 9:05 AM, Meredith Jury <majury470@gmail.com> wrote:

No. I only have your dates for this mediation

On Mon, Feb 12, 2024 at 8:55 AM Reem Bello <rbello@goeforlaw.com> wrote:

Good morning Judge Jury,

Have we heard from the Debtor regarding dates? Thank you.

Reem J. Bello | Partner
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On Feb 2, 2024, at 11:52 AM, Reem Bello
<rbello@goeforlaw.com> wrote:

Judge Jury,

Good afternoon. The Vagos are available on February 21 and March 6 for a Zoom mediation session. Thank you.

<image001.png>

Reem J. Bello | Partner
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From: Meredith Jury <majury470@gmail.com>
Sent: Wednesday, January 31, 2024 12:51 PM
To: Steven Mayer <smayer@mayerlawla.com>
Cc: Reem Bello <rbello@goeforlaw.com>; Susan Stein <sstein@goeforlaw.com>; Rob Goe <rgoe@goeforlaw.com>; Leslie Klein <les.kleinlaw@gmail.com>; Marc Lieberman <marc.lieberman@flpllp.com>
Subject: Re: Mediation in the Case of Leslie Klein

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If I understand these two emails correctly, there are two adversaries against the debtor and therefore a need for two mediations. I believe that both need the mediation at least started by March 10. Mr. Lieberman's email implies some things may change that deadline but right now I am working with the ordered date. I am willing to do both and am sending out the

dates in this one email for all of you to figure out what date might work for each mediation. My dates between now and March 10 are February 12, 19, 21, 23, 26 and March 1, 4, 6, 8. It would help if I got a separate email selecting a date for each mediation so that I can be certain which attorneys and parties are involved with that particular mediation. Thanks.

P.S. later dates in March are 11, 20, 25, 27, and 29 if the deadline changes.

On Wed, Jan 31, 2024 at 12:26 PM Steven Mayer
<smayer@mayerlawla.com> wrote:

Ms. Bello, thank you for including me on your below email.

Judge Jury, I represent the Plaintiff in the other adversary matter mentioned in Ms. Bello's email, which Judge Klein also ordered to mediation and with the same deadlines. I have been speaking with Ms. Bello and Mr. Lieberman in this regard, and I am also interested in having you mediate my case. They do not object to this request.

My client is Jeffrey Siegel, Successor Trustee of the Scott Trust Agreement dated December 24, 1992. Judge Klein entered a Scheduling Order with the same deadlines as Ms. Bello's case. Attached are copies of the Complaint and Scheduling Order.

Thank you.

-Steve

Steven M. Mayer, Esq.

Mayer Law Group, A.P.C.

<image002.png>

16133 Ventura Blvd., PH

Encino, CA 91436

T [\(818\) 528-2858](tel:(818)528-2858)

F [\(818\) 514-2728](tel:(818)514-2728)

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From: Reem Bello <rbello@goeforlaw.com>

Sent: Wednesday, January 31, 2024 11:58 AM

To: 'Meredith Jury' <majury470@gmail.com>

Cc: Susan Stein <sstein@goeforlaw.com>; Rob Goe

<rgoe@goeforlaw.com>; Leslie Klein

<les.kleinlaw@gmail.com>; Marc Lieberman

<marc.lieberman@flpllp.com>; Steven Mayer

<smayer@mayerlawla.com>

Subject: Mediation in the Case of Leslie Klein

Good morning Judge Jury,

I represent Erica and Joseph Vago (“Vagos”) in the bankruptcy case of debtor Leslie Klein (“Debtor”). Debtor is cc’d on this email as well as proposed counsel for Debtor in this nondischargeability adversary proceeding the Vagos filed against the Debtor. Judge Sandra Klein ordered the parties to mediation. The parties have met and conferred as required by the Court on choice of mediator and have agreed to contact you regarding your availability to mediate this matter. Pursuant to the scheduling order attached, the parties must complete one day of mediation by March 10. Are you available and interested in mediating this matter? If so, please let us know what dates and times work for you between now and March 10.

Also, there is another nondischargeability adversary proceeding involving a separate, unrelated plaintiff who may also be interested in having you mediate their adversary

proceeding. I have cc'd counsel for that plaintiff on this email as well. Thank you.

<image001.png>

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EXHIBIT 11

EXHIBIT 11

From: [Leslie Klein](#)
To: [Marc Lieberman](#)
Cc: [Reem Bello](#)
Subject: Re: Mediation
Date: Friday, March 1, 2024 9:49:37 AM

CAUTION: This email originated from outside of the organization. Do not click links or open attachments unless you recognize the sender and know the content is safe.

I am not available Marc 6 or 7. I am available any day March 27 to April 10. Thsnx

Sent from my iPhone

> On Feb 29, 2024, at 4:46 PM, Reem Bello <rbello@goeforlaw.com> wrote:

>

> Mr. Klein,

>

> March 29 was never agreed to. March 29 is a religious holiday, it is Good Friday and I am not available on that day. I am not going to argue with you about the plain language of the order. Your proposed date does not comply with the Court's order and further, I am not available on that date. Are you refusing to comply with the terms of the Court's order which requires that one day of mediation be completed by March 10? Again, you cannot unilaterally choose the date and unilaterally determine what the Court requires. The parties must comply with the terms of the Court's order.

>

>

> Reem J. Bello | Partner

> Goe Forsythe & Hodges LLP

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> rbello@goeforlaw.com | www.goeforlaw.com

>

>

> -----Original Message-----

> From: Leslie Klein <les.kleinlaw@gmail.com>

> Sent: Thursday, February 29, 2024 4:41 PM

> To: Reem Bello <rbello@goeforlaw.com>

> Subject: Re: Mediation

>

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>

> You agreed to March 29. March 29 is not a Jewish holiday. The judge had no problem as long as we conclude the mediation by April 15. We can pick another date that I am available and the Vago's are available and the Judge is available between March 25 and April 9.

>

> Sent from my iPhone

>

>> On Feb 29, 2024, at 4:11 PM, Reem Belloe mediati<rbello@goeforlaw.com> wrote:

>>

>> Mr. Klein,

>>

>> You cannot unilaterally set the mediation date. The mediation must be a mutually agreeable date between all parties involved, including the mediator, Judge Jury, and with the Vagos who are the plaintiffs. I am not available on March 29, 2024 which is a religious holiday. Moreover, March 29 is a Friday and the Vagos are not available on Fridays. The Judge ordered one session of mediation to be completed by March 10. Have you read the order?

>>

>>

>> Reem J. Bello | Partner
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>> www.goeforlaw.com

>>

>>

>> -----Original Message-----

>> From: Leslie Klein <les.kleinlaw@gmail.com>
>> Sent: Thursday, February 29, 2024 3:44 PM
>> To: majury470@gmail.com
>> Cc: Reem Bello <rbello@goeforlaw.com>
>> Subject: Mediation

>>

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>>

>> I am not available March 6. I have the mediation set for March 29. Thank you The Judge did not say that if has ti be completed by March 10.

>>

>> Sent from my iPhone

>>

>>

>>

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PROOF OF SERVICE OF DOCUMENT

I am over the age of 18 and not a party to this bankruptcy case or adversary proceeding. My business address is: 17701 Cowan, Bldg. D., Suite 210, Irvine, CA 92614

A true and correct copy of the foregoing document entitled (*specify*): **STATEMENT OF PLAINTIFFS RE PLAINTIFFS' EFFORTS TO COMPLY WITH SCHEDULING ORDER AFTER STATUS CONFERENCE; DECLARATION OF REEM J. BELLO IN SUPPORT THEREOF** will be served or was served (a) on the judge in chambers in the form and manner required by LBR 5005-2(d); and (b) in the manner stated below:

1. TO BE SERVED BY THE COURT VIA NOTICE OF ELECTRONIC FILING (NEF): Pursuant to controlling General Orders and LBR, the foregoing document will be served by the court via NEF and hyperlink to the document. On (*date*) March 1, 2024, I checked the CM/ECF docket for this bankruptcy case or adversary proceeding and determined that the following persons are on the Electronic Mail Notice List to receive NEF transmission at the email addresses stated below:

- Reem J Bello rbello@goeforlaw.com, kmurphy@goeforlaw.com
- Robert P Goe kmurphy@goeforlaw.com, rgoe@goeforlaw.com;goeforecf@gmail.com
- Michael I. Gottfried mgottfried@elkinskalt.com, cavila@elkinskalt.com,lwageman@elkinskalt.com,docketing@elkinskalt.com
- Brian A Procel bprocel@millerbarondess.com, rdankwa@millerbarondess.com;docket@millerbarondess.com
- Nikko Salvatore Stevens nikko@cym.law, mandi@cym.law
- United States Trustee (LA) ustpregion16.la.ecf@usdoj.gov
- Clarisse Young youngshumaker@smcounsel.com, levern@smcounsel.com

☐ Service information continued on attached page

2. SERVED BY UNITED STATES MAIL:

On (*date*) March 1, 2024, I served the following persons and/or entities at the last known addresses in this bankruptcy case or adversary proceeding by placing a true and correct copy thereof in a sealed envelope in the United States mail, first class, postage prepaid, and addressed as follows. Listing the judge here constitutes a declaration that mailing to the judge will be completed no later than 24 hours after the document is filed.

Leslie Klein, 322 N. June Street, Los Angeles, CA 90001

☐ Service information continued on attached page

3. SERVED BY PERSONAL DELIVERY, OVERNIGHT MAIL, FACSIMILE TRANSMISSION OR EMAIL (*state method for each person or entity served*): Pursuant to F.R.Civ.P. 5 and/or controlling LBR, on (*date*) March 1, 2024, I served the following persons and/or entities by personal delivery, overnight mail service, or (for those who consented in writing to such service method), by facsimile transmission and/or email as follows. Listing the judge here constitutes a declaration that personal delivery on, or overnight mail to, the judge will be completed no later than 24 hours after the document is filed.

- The Honorable Sandra R. Klein, USBC, 255 E. Temple Street, Ctrm 1575, Los Angeles, CA 90012

☐ Service information continued on attached page

I declare under penalty of perjury under the laws of the United States that the foregoing is true and correct.

March 1, 2024
Date

Susan C. Stein
Printed Name

/s/Susan C. Stein
Signature